

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ Delta, LLC,
Plaintiff,

v.

CommScope Holding Company, Inc., et al.,
Defendants.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED



DECLARATION OF RAJENDRA A. CHIPLUNKAR

I, Rajendra A. Chiplunkar, state as follows in support of Plaintiff TQ Delta, LLC's Motions for Summary Judgment on Families 1 and 10:

1. I am a partner at McAndrews, Held & Malloy and counsel of record for TQ Delta, LLC. I am a member in good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains a true and correct copy of U.S. Patent No. 7,570,686 to Tzannes et al.
3. Exhibit B contains a true and correct copy of U.S. Patent No. 9,154,354 to Tzannes et al.
4. Exhibit C contains a true and correct copy of U.S. Patent No. 8,937,988 to Tzannes et al.
5. Exhibit D contains a true and correct copy of the Expert Report of Arthur Brody, PhD., on Infringement of the Family 1 and Family 10 Patents by Commscope.
6. Exhibit E contains an excerpt of a true and correct copy of Defendant's Supplemental Response to Interrogatory No. 8 and Second Supplemental Response to Interrogatory No. 8 at p. 60-62 (August 19, 2022).
7. Exhibit F contains an excerpt of a true and correct copy of Commscope's First Supplemental Objections and Responses to Plaintiff's Second Set of Interrogatories (No. 19) (August 18, 2022).
8. Exhibit G contains an excerpt of a true and correct copy of Commscope's Sixth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories (No. 14) (November 14, 2022).
9. Exhibit H contains an excerpt from a true and correct copy of the deposition transcript of Dr. Gang-San Yu, dated August 24, 2022.
10. Exhibit I contains an excerpt from a true and correct copy of the Opening Expert Report of Todor Cooklev, PhD., dated August 29, 2022.
11. Exhibit J contains an excerpt from a true and correct copy of the Responsive Expert Report of Dr. Naofal Al-Dhahir Regarding Family 10, dated November 18, 2022.
12. Exhibit K contains an excerpt from a true and correct copy of the Responsive Expert Report of Dr. Leonard J. Cimini, Jr. on the Non-Infringement of the Family 1 and 4 Patents, dated November 18, 2022.
13. Exhibit L contains a true and correct copy of the uncertified deposition transcript of Mr. Walter Overby, dated December 9, 2022.
14. Exhibit M contains an excerpt from a true and correct copy of the uncertified deposition transcript of Al-Dhahir, dated December 5, 2022.

15. Exhibit N contains an excerpt from a true and correct copy of the Responsive Expert Report of Walter Overby Regarding Broadcom Source Code as Used in Commscope Products Related to Loop Diagnostic Mode, SNR Margin, and Bonding, dated November 18, 2022.
16. Exhibit O contains a true and correct copy of U.S. Patent No. 6,516,027 to Kapoor et al.
17. Exhibit P contains an excerpt of a true and correct copy of the Opening Expert Report of Mark R. Lanning on the Invalidity of the Asserted Claims of the Family 10 Patents (U.S. PATENT NOS. 9,154,354; 8,937,988).
18. Exhibit Q contains an excerpt from a true and correct copy of the deposition transcript of Benjamin Miller, dated December 5, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of December 2022, in River Forest, Illinois.

/s/ DRAFT
Rajendra A. Chiplunkar